<u>Introduction.</u> This initial Coordinated Public Transit – Human Services Transportation Plan is being created by the Orange County Transportation Council in cooperation with the county's human service agencies to meet the new planning requirement for three types of Federal Transit Administration (FTA) funding. The plan will also serve as the foundation for future public transit / human service transportation coordination and planning which is expected to go beyond these three FTA funding sources.

This new planning requirement arises from the Safe, Accountable, Flexible and Efficient Transportation Equity Act (SAFETEA) of 2005. As of July 2007, any new projects selected for funding under these programs must be "derived from a locally developed public transit human service coordinated transportation plan". The plan process must include "representatives of public, private, and non-profit transportation and human services providers and participation by members of the public."

The following FTA programs that provide funding for transportation services must be consistent with this locally developed coordinated plan:

- Section 5310 Elderly and Individuals with Disabilities Program
- Section 5316 Job Access and Reverse Commute (JARC) Program
- Section 5317 New Freedom Program

Federal transit funding is provided directly to "Designated Recipients", which may operate public transit services or which may pass through funding to agencies and companies that operate public transit services). In New York State, the Designated Recipient for Section 5310 funding is the NYS Department of Transportation (NYSDOT). Eligible local agencies in Orange County and elsewhere across the State apply directly to the NYSDOT main office, which administers the funding through local subcontracts. Recent Orange County recipients of Section 5310 funding include AHRC, Inc. and Occupations, Inc. With the passage of SAFETEA, New York State is obligated to engage in a higher level of coordination with Metropolitan Planning Organizations (MPOs) like the Orange County Transportation Council, which is one of thirteen such federally-required, state-chartered transportation organizations in the state.

For the Section 5316 and 5317 programs, the Orange County Transportation Council has requested that the sole existing, *local* designated recipient for FTA funding, the County of Orange, be designated to serve in this capacity for these new funding programs as it does for other FTA funding programs such as Section 5307 and 5309. [The Metropolitan Transportation Authority is also a designated recipient able to receive funding directly from the FTA.]

Another change brought about by SAFETEA is that funding for the Job Access Reverse Commute (Section 5316) program and the New Freedom (Section 5317) program is now formulaic – funding is allocated according to a method specified in federal legislation. So, while Orange County is currently operating a JARC program, the funding preceded SAFETEA and came in the form of two Congressional funding earmarks (Section 5309). Under the new SAFETEA funding formulas, Orange County qualifies for Section 5316 and 5317 allocations based on the "Large Urban" Newburgh area (which is connected to the Poughkeepsie and Kingston urban areas; collectively over 200,000 in population) and the "Small Urban" Middletown area (greater than 50,000 but less than 200,000 population). Because of the

connection to urban areas in Dutchess and Ulster Counties, the sub-allocation of the Large Urban funding must be coordinated by the three transportation councils in this area (which is known as the Transportation Management Area, or TMA, another designation stemming from federal transportation legislation).

Orange County's current JARC demonstration program supports van transportation of eligible clients from the Newburgh and Middletown areas to jobs at warehousing and distribution centers in other areas. New funding for the existing Orange County JARC program would derive from the formulaic Section 5316 funding program.

There is no current utilization of New Freedom program funding (FTA Section 5317) by any of the three counties in the TMA.

Urbanized areas, as defined by the Census Bureau with a population of over 50,000, are required to form or be part of a Metropolitan Planning Organization. The Orange County Transportation Council (OCTC) is the MPO for Orange County, NY. It was designated by the Governor in 1982. Like all other MPOs in the country, OCTC is a multi-agency planning entity which is required to carry out certain responsibilities in accordance with Federal surface transportation legislation such as SAFETEA. This legislation has been effectuated by the US Department of Transportation through Federal regulations. Program guidance is also often disseminated by the FTA (and other Federal agencies) through "circulars". In regard to the three programs which are a particular focus for this plan, the FTA issued or updated circulars for each of the funding programs on May 1, 2007. The circulars, all of which may be accessed via the FTA's website at www.fta.dot.gov/leg\_reg.html, are as follows:

- o Circular 9070.1F entitled, "Elderly Individuals and Individuals With Disabilities Program Guidance and Application Instructions" (Section 5310), 112 pages
- o Circular 9050.1 entitled, "The Job Access And Reverse Commute (JARC) Program Guidance And Application Instructions" (Section 5316), 119 pages
- Circular 9045.1 entitled, "New Freedom Program Guidance and Application Instructions" (Section 5317), 123 pages

Like previous Federal transportation legislation, SAFETEA requires that MPOs produce three major products: a Metropolitan Transportation Plan (locally referred to as the Long Range Transportation Plan); a Transportation Improvement Program (TIP) that sets out a schedule of capital projects to be funded and built/undertaken with Federal Highway or Transit funding (for convenience in this state the TIP includes all large agency projects whatever the funding source); and an annual Unified Planning Work Program (UPWP). The aforementioned three-county Transportation Management Area (TMA), which includes Dutchess and Ulster Counties, does not have a separate governing body. Activities are coordinated and then acted on separately by three



governing bodies of each MPO. TMA activities include sub-allocation of certain Federal transit funds (previously just Section 5307, now to include Section 5316 & 5317 as well; Section 5310 funding will continue to be administered by NYSDOT). Other TMA responsibilities include

improved coordination of inter-county transit operations and undertaking a required Congestion Management Process which was initiated in 2005.

Coordinated Public Transit / Human Services Transportation Planning (CPTHSTP). The principles behind the coordinated planning requirement are not new and neither are discussions and coordination between human service agencies, the county's transit staff and local transit/transportation providers. This coordination has occurred in the context of planning for the County's long-operating ADA Paratransit services as well as, among other things, regular participation with a continuing ad hoc committee of mental health service agencies. Most recently, the County Planning Department's transit staff coordinated with the County Employment and Training Administration (ETA) to prepare a regional JARC plan which was a requirement for FTA approval of the current program. It predates the new CPTHSTP requirement; elements of that plan are being used for this document.

The new coordinated planning requirement provides an opportunity to formalize and improve upon existing collaboration, invite participation from community stakeholders and ensure that human service needs are represented in public transit planning processes. In addition to addressing the federal legislative requirement for the three FTA funding programs, this and future coordinated plans will work to broaden transportation planning processes to better serve the combined needs of county residents who may require assistance from human service agencies. As was articulated and reinforced in many forms by the human service agencies that participated in this planning process, transportation is a critical link in the transition from assistance to independence. It is sincerely hoped by all concerned that the need for some human services may be reduced to some extent as needed, general improvements to public transit services are made. The dialogue between transit planners, human service agencies, transportation coordinators, transit operators, county residents, and others occurs in the context of two straightforward procedural goals:

- 1. Meet federal legislative requirements for the FTA Section 5310, 5316 and 5317 programs so that such funds may be applied for expended within Orange County. (*In the first instance, this is the reason why such a plan is required.*)
- 2. Create an ongoing, cooperative planning process that goes beyond the minimum federal requirements to identify creative strategies which will effectively serve the transit and transportation needs of residents; improve quality and accessibility of services; and reduce or eliminate service duplication through better coordination and a more holistic examination of costs and spending.

This Coordinated Public Transit-Human Services Transportation Plan is consistent with the Orange County Transportation Council's Long Range Transportation Plan adopted in November 2007. Following the interim guidance released in the March 15, 2006 Federal Register, the subsequently issued FTA program circulars, and drawing on technical assistance materials provided by the New York State Department of Transportation regarding requirements for this coordinated plan, this planning process seeks to:

- Assess transportation needs for individuals with disabilities, older adults, and persons with limited incomes
- Inventory available services and identify areas of redundant services or service gaps

• Present and prioritize potential strategies to address identified gaps in service, eliminate or reduce duplication in services, and provide more efficient utilization of resources

<u>Federal Funding Requiring a Coordinated Plan.</u> Following is additional information regarding the three Federal Transit Administration funding programs for which such a coordinated plan is required:

The Section 5310 program provides formula funding to States for the purpose of assisting private nonprofit groups in meeting the transportation needs of the elderly and persons with disabilities where existing transportation services are unavailable, insufficient, or inappropriate to meeting these needs. The NYS Department of Transportation is the agency designated by the Governor to administer this federal funding program in New York. Through the NYSDOT Section 5310 Grant Program, funds are used to purchase buses for not-for-profit organizations throughout the state. The program funds 80% of vehicle purchase costs, with the remaining 20% provided by the applicant organization as the local match. No operating funds are provided through the 5310 program. Recipients are responsible for 100% of their ongoing operating expenses for buses.

Section 5310 program grants are awarded on the basis of a state-wide competition (not by NYSDOT or MPO region). Application review criteria include factors such as need and the capacity of the applicant. With the new federal legislation, there is also now a requirement for Section 5310 applicant needs to be represented in the locally-developed, coordinated public transit-human services transportation plan. In recent years the Orange County Chapter of NYSARC, Inc. (now known as AHRC, Inc.) and Occupations, Inc. are the agencies which have received 5310 funding in Orange County.

Four types of buses are presently available through the 5310 program, ranging from 12-passenger to 40-passenger capacity vehicles. All must be equipped with wheelchair lifts and spaces. Not-for-profit organizations which serve elderly individuals or individuals with disabilities are eligible to apply, as are county & local governments which certify that not-for-profit organizations are not available in the area to provide such services or are approved by the State to coordinate such services. Successful applicants subsequently purchase buses under the State's procurement process. Agencies normally can expect to receive vehicles within nine to twelve months after executing contract agreements with NYSDOT.

In Federal Fiscal Year (FFY) 2007, the State of New York was apportioned approximately \$7.94 million in Section 5310 funding, roughly 6.8% of the total national Section 5310 apportionment. Ninety-seven organizations statewide were awarded vehicles through this grant assistance program for the FFY 2007 grant cycle.

The Section 5316 Job Access and Reverse Commute (JARC) program is intended for employment-related transportation projects, both to fill gaps in existing services and to leverage other federal, state and local transportation funding in order to address the unmet needs of individuals moving from welfare to work. JARC funds help to improve mobility and economic opportunity for welfare recipients and other low-income individuals through the provision of new or expanded transportation services to suburban employment opportunities. There is wide flexibility in selecting service strategies tailored to community needs. Strategies include: late-

night and/or weekend service; guaranteed ride home service; shuttle service; expanded fixed routes; demand-responsive services; transit voucher programs; employer-provided transportation utilizing shuttles, ridesharing, carpooling; and the use of "transit pass" programs and benefits under Section 132 of the Internal Revenue Code. The maximum Federal share under the JARC Program may not exceed fifty percent (50%) of the total project cost.

The current Orange County JARC program is operated by the County Employment and Training Administration (ETA) in coordination with the County Planning Department, which coordinates the County's transit programs and administers FTA grants. Due to the success of ETA's JARC program and high demand/unmet need, a key element of this plan is to articulate the need for continued and expanded service using the new Section 5316 formula funding. A secondary, but equally important goal is to prevent discontinuity in program services for clients while developing a means to meet the competitive requirements of the new legislation.

The Section 5317 New Freedom program supports new public transportation services and public transportation alternatives beyond those required by the Americans with Disabilities Act (ADA). This formula funding program aims to provide additional tools to overcome existing barriers facing Americans with disabilities seeking integration into the work force and full participation in society, reducing barriers to transportation services and expanding transportation mobility options. Individuals who are transportation-disadvantaged face different challenges in accessing services depending on whether they live in urban, rural, or suburban areas. The geographic dispersion of transportation-disadvantaged populations also creates challenges for human service programs hoping to deliver transportation for their clients. Over the years, in response to these challenges, Federal, State and local governments, and community-based organizations created specialized programs to meet particular transportation needs. At the Federal level alone, there are at least sixty separate programs administered by eight Federal departments that provide special transportation services to individuals with disabilities, older adults, and persons with low incomes. Most of these are human service programs that fund limited transportation services to provide eligible participants with access to particular services, such as job training, health care, senior centers, or rehabilitation programs. The Section 5317 New Freedom program is intended to fill the gaps between human service and public transportation services previously available and to facilitate the integration of individuals with disabilities into the workforce and full participation in the community. This program is new; no 5317 funding has been granted to date for activities within Orange County.

**Demographic, Employment, and Commuting Patterns.** In recent years Orange County has been one of the fastest growing counties in New York State. This increasing residential development, population growth, and commercial development have contributed to making Orange County a visibly different place than the largely rural agricultural landscape it was previously. While this growth has brought opportunity and prosperity, it also has real costs. Several of our historic cities and villages still struggle for a role in this prosperity, and six of these historic centers have had modest losses of population in the last decade. Relative affordability compared to the greater New York metropolitan region stimulated significant inmigration, but has diminished housing affordability.

[For a more complete description of Orange County, its demographics, transportation systems, and other information, please consult the OCTC Long Range Transportation Plan, the Orange County

Comprehensive Plan and other adopted plans and studies which can be accessed at the County Planning Department website (<a href="www.orangecountygov.com/planning">www.orangecountygov.com/planning</a>) or by contacting the planning department directly.



Transportation can be defined as the physical movement of people and goods from one place to another. A historical national policy supporting continued investments in new roads and highways helped to make it possible for origins and destinations of trips to be dispersed. These and other factors have resulted in a greatly expanded use of motor vehicles. The evolution and the demands to satisfy automobile use have resulted in a continuous call to expand capacity on the highway network. It has both contributed to and has been fostered by dispersed land use patterns in residential and non-residential development, commonly characterized as "sprawl". Regardless of the basic causes, the dispersion

of activity and development from central cities, to suburbs, and "exurbia" has been apparent in Orange County.

Orange County received its charter as one of the original counties of New York State in 1687. Today, the County has 20 towns, 19 villages and 3 cities. Located at the geographic center of the Boston to Washington corridor of 40 million people and the northern fringe of the 20-million New York-northern New Jersey-Long Island, NY-NJ-CT-PA Consolidated Metropolitan Statistical Area (CMSA), Orange County has both regional and metropolitan transportation connections.

Orange County population increased from 221,647 in 1970, to 259,600 in 1980, to 307,647 in 1990, and to 341,367 in 2000. The increase of 10.96 percent from 1990 to 2000 was much larger than the 5.5 percent increase for New York State as a whole. While the unemployment rate has fluctuated, it remained at 4.3% in 2002 as it did in 1990. Although the labor force grew 3% from 1990 to 2000, it increased by an additional 4.8% by 2002. The estimate county population today is approximately 375,000. Much of the employment is dispersed so there is a high dependence on personal vehicles for work trips. There is on average one vehicle available for every licensed driver in Orange County. This is typical of most suburban counties in New York State. For now, the primary exception to reliance on personal vehicles is for commuting trips to New York City, Westchester County and New Jersey. These trips are made on a variety of modes, primarily bus and rail.

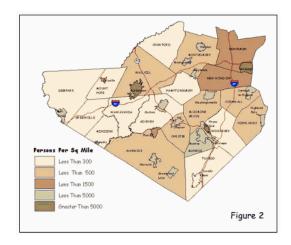
The 2000 Census revealed that the majority of the County's population, 61%, resided in its 20 towns (outside the villages), 21% in its 17 villages, and the remainder, 18%, in its three cities. In 1940, 45% of the County's residents were located in its cities, and only about 38% of the resident population located in the towns. From 1940 to 1970 population shifted away from the cities; by 1970 56% of the County's population resided in its towns. During this time, the village share of the population remained fairly stable at 18%. In 2006, two new villages were created in the County, the Villages of South Blooming Grove and Woodbury. The migration of county residents to outlying areas and the increasing trend to locate corporate parks and distribution

centers on the outskirts of populated areas present challenges for public transit, in turn challenging low income persons who may not be able to count on personal vehicles for mobility.

From 1990 to 2000, the Town of Monroe's population increase of 36% placed it among the leading growth communities in the County. This growth was in large part due to the substantial population growth rates in the Village of Kiryas Joel, which was established in 1977. Although the County saw a population increase of 11% during this time period, 13 of its towns and 4 of its

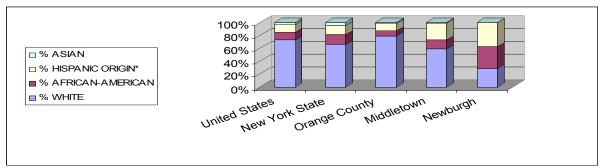
villages exceeded this growth rate. From 1990 to 2000, the average growth rate of the cities was 3.2%, with the city of Newburgh being the most populous in 2000, with 28,259 residents.

Based upon Census 2000 data, Orange County, comprised of 816 square miles, had a population density of 418 persons per sq mile. The cities of Newburgh and Middletown along with the Village of Kiryas Joel all exceeded 5,000 persons per square mile. The Town of Tuxedo, with a population density of 70 persons per square mile, was the least densely populated municipality.



In 2000, with a median age of 35, Orange County was among the youngest counties in the region. It parallels the national median age of 35.3, while slightly younger than the State's median age of 36. The County has 'aged' 5 years since 1980, when the median age was 30.2. Like the nation, it is expected to continue to slowly age. Census data and proprietary data sources indicate the trend in age distribution to be a slow gradual decline in those aged 45-54, with an increase in those aged 65 and over. In 2000, 10% of the population was over the age of 65, which is projected to increase to 14% by 2020.

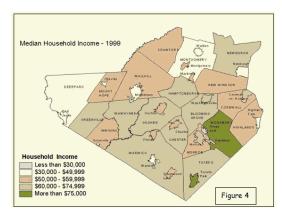
Census figures show Orange County is racially and ethnically diverse. Although changes in US Census Bureau methodologies have affected racial comparisons, the trends occurring within the County regarding racial composition mirror changes which are occurring on both the national and state levels. The 2000 Census estimated that the County's population was 84% white, 8% black, and 1.5% Asian/Pacific Islander. Hispanic, an ethnic category that may include all categories of race, was estimated to be 12%. The increase in the Hispanic population is consistent with the growth of this segment in neighboring counties such as Westchester and Rockland. The African-American population is largely urban in Orange County. Despite recent



immigration from Asia, the Asian population is less than 2%. Hispanics are the largest segment of the minority population, and are also largely urban. In the New York metropolitan region ethnic diversity varies inversely with proximity to New York City. Orange is less diverse than its southern neighbors, but more diverse than neighbors to the north. A similar pattern is found in the percentage of foreign-born residents, about 7% of Orange County's population

The Hispanic population has increased 85% since the 1990 Census, followed by a 48% increase in Asian residents. The African-American and white populations saw increases in their populations of 24% and 4%, respectively. Census 2000 data indicated that 69% of the County's Black population and 63% of its Hispanic population resided in five communities, with the cities of Newburgh and Middletown in the forefront. With the exception of the City of Newburgh, a large percentage of the Asian population resides in these same communities.

There were approximately 123,000 thousand housing units in Orange County according to the 2000 census. As of this writing, it is estimated there are about 132,000 housing units. The ratio of owner-occupied to renter-occupied units has remained fairly stable at about 2 to 1. Of the owner-occupied units, 37% had two vehicles and 23% had three vehicles or more. In 1980, 42% of Orange County's 93,274 units of housing were designated as 'rural', that is, they were located outside the census-designated urbanized areas. By 2000, only 24% of the housing units were classified as being in



rural areas, with the expectation that it will be less when the 2010 census is taken.

In 2005, the median income of households in Orange County was approximately \$63,000. The median household income for New York State in 2005 was about \$49,500. Nationally, the median household income was approximately \$46,250. For many current residents, including senior citizens, younger adults and families, and people with more modest incomes, housing in the County is increasingly unaffordable. Among the municipalities where the median income was lower than that for the entire county were the three cities. The cities of Newburgh and Middletown have very high poverty level. There were 2,133 recipients of Temporary Aid for Needy Families (TANF) in Orange County in 2005.

	Family Household	Persons
	Median	Below
Location	Income	Poverty
NY State	\$43,393	14.60%
Orange Co.	\$52,058	10.50%
Port Jervis	\$30,241	17.50%
Middletown	\$39,570	17.50%
Newburgh	\$30,332	25.80%

In Newburgh, 52.2% of families earned less than \$35,000 a year (2000), roughly the local poverty line for a family of four at that time, as estimated by Regional Economic and Community Action Partnership in Middletown. 25.8% of families earn below the Federal

poverty line (\$19,350 for a family of four). 39% of the adult population was not in the workforce; 5.4% was looking for work but couldn't find it; 38% of adults had no high school

diploma and 38% of households paid at least 35% of their income in rent. The current teen pregnancy rate in the city is three times the county's average. Newburgh has 999 TANF recipients, or 47% of Orange County's total.

For these reasons, the east end of Newburgh has been designated as a federal enterprise zone. Also, Orange County's NYS Empire Zone is based nearby at the intersection of Interstates 84 & 87 (NYS Thruway). The NYS Empire Zone Program provides eligible companies in designated areas with wage tax credits, sales tax refunds and investment tax credits. The Port Authority of New York and New Jersey, which recently acquired the lease from NYS to operate Stewart International Airport, which is near both of these areas, has identified access to airport jobs by Newburgh area residents as a critical need for local transit service planning and improvements.

In Middletown, 14% of families are below the poverty level; 25% of adults have a disability, and of those 46% are unemployed (excluding those 65 and older); 26% of families with children under 5 live below the poverty guideline and of the 20% of female heads of households, 35% are below poverty level.

Orange County has a higher share of blue-collar workers (24%) than the State as a whole (20%), and a higher concentration of jobs in wholesale-retail trade and transportation-communication-public utilities (27% and 20%, respectively). This reflects the local area's success in attracting trucking and warehouse operations as well as its status as a retail hub.

As Orange County's population has increased, so too has the number of total workers. Between 1990 and 2000, the total workers residing in the County increased about 8% to 152,489. The local economy employs about 70% of the resident workforce and also attracts about a third of its workers from outside the county. These workers often earn less than the median income. More than 30% of Orange County's workforce commutes to jobs outside the county, primarily in New York City, Westchester and Rockland Counties and northern New Jersey. These workers often earn salaries above the County's median income, also skewing the reality of economic difficulties in many sections of the county.

In 2000, the average travel time to work was 32 minutes, an increase of about 5 minutes from 1990. In 1980, the average journey to work was a little more than 24 minutes. In 2003, for workers aged 16 and over and not working at home, the average travel time to work was 32.5 minutes, which when nationally-ranked, positioned Orange County as having the 9<sup>th</sup> longest travel times, behind top-ranked Queens County with an average time of 41.7 minutes. The average commute time nationally was 24 minutes. The term extreme commute has also come to define the trip to work for a growing number of people.

The majority of workers drove alone to work and from 1990–2000 this category experienced an increase of 12%. In 2000, 76.6% of the workforce commuted in their own cars. Based on Census 2000 data, only 4.7% used public transportation. For low-income residents who do not own a reliable vehicle, this presents a huge challenge. Census data shows that carpooling has decreased over the years. In 1980, 22% of workers carpooled. By 2000 this number had dropped to 11%.

<u>Existing Public Transit Services.</u> Public transit services in Orange County include various fixed-route, demand-responsive and inter-county/commuter bus services operated by private and

municipal operators, passenger rail service on the Port Jervis Line, and passenger ferry service across the Hudson River between Newburgh and Beacon connecting to the Hudson Line. The local fixed-route bus services are largely limited to service within commercial and retail areas in and near the cities of Newburgh and Middletown and the Villages of Monroe and Kiryas Joel.

*Coach USA/Shortline/Hudson Transit* is the largest provider of bus service in and through Orange County. Coach USA serves over 1,250,000 Orange County passengers annually and has operating expenses in excess of \$13,000,000. County-wide service is provided for intercity



travelers and commuters. Most of the service is provided along the I-84, Route 17, and Route 32/I-87/Route 9W corridors. Coach USA also serves a number of major trip generators including the Galleria at Crystal Run and Woodbury Common Premium Outlet Center. Coach USA provides major commuter service to New York City with

over 100 trips per day to and from Orange County during the morning and evening peak hours. Coach USA also provides service to the East Side of Manhattan via the George Washington Bridge and operates the Orange Westchester Link (OWL) which provides service to the White Plains area. Both of these services are provided via five daily weekday round trips. [New intracounty fixed-route service operated by the *Town of Warwick* linking the Towns of Warwick and Goshen was introduced in 2003; this service was extended to connect to the Town of Wallkill system in 2007.]

Under contract with NYSDOT and Orange County, Coach USA/Shortline operates the Main Line bus service, which until recently, used trolley buses provided by the operator. The County replaced the trolley buses with regular transit buses in June 2007, using a combination of Federal, State and operator-provided funds. The new Main Line buses were the first to use the County's new "Transit Orange" logo.

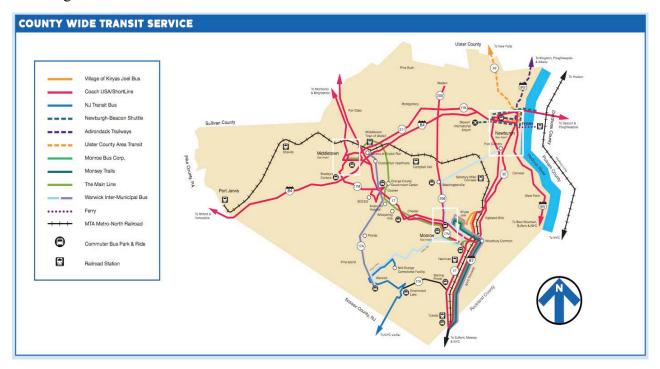


*Monroe Bus Corporation* provides commuter and off-peak service to Manhattan and Brooklyn to and from the Village of Kiryas Joel. In 2006, Monroe Bus recorded nearly 300,000 trips. *Monsey Trails* connects Kiryas Joel and Monsey in Rockland County with five daily roundtrips. Ridership on this route has steadily increased with an average of 200 riders per day in 2006.

*New Jersey Transit* provides commuter and off-peak bus service to New York City and northern New Jersey from Warwick and Greenwood Lake. This bus service is provided along Route 210 and Route 17A and serves the Greenwood Lake and Warwick park & ride lots. New Jersey Transit also operates the Port Jervis passenger rail service for *MTA MetroNorth*, with stations in Harriman, Salisbury Mills/Cornwall, Campbell Hall, Middletown, Otisville and Port Jervis.

Adirondack Trailways provides bus service to New York City, Poughkeepsie, and Kingston. This service is provided along the Route 9W corridor and crosses the Mid Hudson Bridge to reach Poughkeepsie. *Ulster County Area Transit (UCAT)* provides five daily weekday

roundtrips between Newburgh and New Paltz in Ulster County along the NYS Route 32 corridor. This service also has stops on Broadway in Newburgh, the 17K park & ride / transit hub, and the Newburgh Mall.



The *Newburgh-Beacon Bus Corporation* has operated two local routes in the City of Newburgh and its environs since 1934. Service is provided within the City as well as to the Newburgh Mall and Wal-Mart on Route 300, the Shop-Rite on Route 32, and the Five Corners area of Vails

Gate. Under contract with NYSDOT, Newburgh-Beacon Bus also operates a shuttle connecting Stewart International Airport with downtown Newburgh, the Route 17K park & ride, and the Metro-North Railroad Beacon Station. Currently Newburgh-Beacon Bus leases four Countyowned buses to help provide these services, which recorded 101,415 passengers in 2006. Newburgh Beacon Bus also currently holds a contract from Orange County to operate the County's *ADA Paratransit* services in Newburgh and Middletown. The Middletown service is subcontracted to Middletown Transit Corporation. All ADA Paratransit vehicles are owned by Orange County and leased to the operator.



The *Middletown Transit Corporation* has been in service since 1935 and leases three County-owned transit buses which provide service on four different bus routes in and around the City of Middletown. In 2006 this bus service was extended for the first time outside of city limits to the retail areas of Town of Wallkill along NYS Route 211. In 2006 Middletown Transit averaged 234 trips per day for an annual total of 58,568 trips.

The *Village of Kiryas Joel* is the County's busiest local fixed-route service provider, with 116,210 trips recorded in 2006, or an average of 385 trips per day. The Village currently leases seven County-owned buses which provide service in the Village as well as destinations in Monroe and Woodbury.

Presently, there are nine *municipal Dial-a-Bus services* in Orange County, which currently lease

36 County-owned vehicles. Dial-a-Bus services are demand-responsive (not fixed-route) systems that provide transportation services to meet the needs of the general public as well as particular individuals such as the disabled and elderly. These operations provide an essential service for the transit dependent and are open to all users through each operator's reservation system. Traditionally operated only within municipal borders, there has been some expansion of service in recent years to cross municipal boundaries.



The *Towns of Goshen-Chester Dial-A-Bus* has expanded service to the Town of Hamptonburgh and the *Town of Warwick* now provides service for the Town of Blooming Grove and takes riders to retail and medical centers in the Town of Wallkill. Other dial-a-bus operations include the *Town of Newburgh, Towns of New Windsor-Cornwall, Town of Monroe, Town of Wallkill, Towns of Montgomery-Crawford, Town of Highlands, and the City of Port Jervis (with limited service into the Town of Deerpark. The County purchased eleven new dial-a-bus vehicles and* 



two new ADA Paratransit vehicles in 2008, all of which sport a new Transit Orange graphic design seen above. This design was purposely chosen to further efforts to visually tie together various bus services in and around Orange County which have direct operational connections, are operated under contract for the county, or which are aided with funding administered by the county. The dial-a-bus design has a blue roof (*shown above*), the Paratransit

buses are distinguished by an orange roof. Within a few years, almost all of the dial-a-buses and paratransit buses will have this graphic look (some operators will continue to operate older buses as spares (white with a colored stripe), until eventually they are all retired). The Transit Orange logo developed in 2006 as a way to unify the diverse transit system of sixteen separate bus operators for which Orange County provides coordination, contracts for service, and administers Federal, State, Local and operator funding for the purchase of transit vehicles and pass-through of operator assistance. The new logos will be placed on all County-owned buses and will appear in printed materials related to County transit, such as the transit guides, schedules, and possibly bus stop signs and shelters.

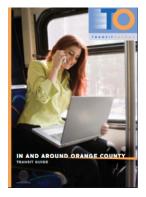
The Town of Warwick operates a fixed-route between Warwick and Goshen Wednesday through Friday and local fixed-route service on weekends. In the Spring of 2007, bus operators from the Towns of Wallkill and Warwick teamed up to start the "Galleria Shuttle", a loop that connects medical services on Crystal Run Road with retail centers at the Galleria Mall and a mini-hub at

Orange Plaza. From the mini-hub, riders can connect with Middletown Transit, the Main Line bus and other services provided by Coach USA/Shortline.

**Public Transit Coordination.** The Orange County Planning Department has two interrelated but distinct transportation roles: local transit coordinator and staff for the transportation council (which to some extent includes transit planning). Areas of responsibility include:

- O System Level Transit Management. OC Planning staff collect operating statistics to constantly gauge the status of the existing transit services and, where appropriate, suggest ways to improve service delivery; implement recommendations from the County-wide Transit Improvement Study; monitor and assess schedules, routes, stops, amenities, service areas, frequency of service, service delivery statistics, types of vehicles used in the provision of the service, and maintenance schedules. Staff also conducts surveys of transit riders, review schedules and suggest marketing strategies.
- Project Level Transit Management. On an as needed, project by project basis, transit staff
  works to secure funding for the replacement and maintenance of existing County-owned
  buses and related equipment which is leased to transit operators.
- o ADA Paratransit System Planning. Staff carry out the implementation and refinement of Orange County's Joint Complementary Paratransit Plan to comply with the paratransit requirements of the Americans with Disabilities Act (ADA) of 1990. Based on this plan, the County, in 1996, initiated paratransit service in and around local fixed bus routes.
- o FTA Grant Management
- o Administration of pass-through State Mass Transportation Operating Assistance
- O Coordination with the County Department of Public Works and the New York State Department of Transportation regarding the operation and management of the state-owned, county-maintained park and ride lot system. Through the initiative of Orange County, NYSDOT and the county agreed in 2007 to eliminate a fee-based permit system and open the lots to free use by commuters.





A new Orange County Transit Guide published in July 2008 provides detailed information and maps regarding the transit services in the county and provides contact information for all the public and commuter transit services. The guide is currently printed in English, but is available in both English and Spanish on the transit website. All of the guide information and the transit information noted in this document can be accessed on the internet at: <a href="www.transitorange.info">www.transitorange.info</a> (which is a portal to the county's central website: <a href="www.orangecountygov.com">www.orangecountygov.com</a>). Information regarding the county's transportation and transit planning activities can be accessed directly at <a href="www.orangecountygov.com/planning/octc">www.orangecountygov.com/planning/octc</a>.

County-sponsored buses traveled a total of 2,556,235 revenue miles in 2006. In 2006 there were 992,097 revenue trips on County sponsored buses with a total operating expense of nearly \$20 million

Coordinated Public Transit – Human Service Transportation Planning Process. To a limited degree, ongoing coordination has existed between the transit and human service agencies providing transportation services in Orange County. This has occurred through paratransit system planning as well as participation by transit staff in regular meetings of a mental health transit working group. Human service transportation providers have recently been added to the OCTC distribution list. Another example began in early 2006 when the continually growing expenditures for medical transportation for Medicaid recipients led to joint discussions between the Orange County Department of Social Services (OCDSS) and the Orange County Planning Department in order to explore ways of collaborating to provide more cost-effective transportation services and the possible leveraging of Medicaid dollars to enhance the public transit system. At the request of OCDSS, County Planning staff provided an initial GIS analysis of OCDSS medical transportation data in the Middletown and Newburgh areas, geo-coding addresses and mapping zip codes to show pick up and destination points for the top 10 destinations and top 1000 medical transportation users over a six month period. This analysis provided an excellent, though limited visualization (and in part suggested that some trips provided by taxis and ambulettes were in areas with existing public transit services; more investigation was needed to determine the nature of travel mode choice). The mapping indicated likely priority destination and pick-up points for public transit route expansion. More such GIS and other analyses are needed. Medicaid regulations are complex and present multiple challenges to successful collaboration between transit planners, bus operators and social service staff. Different standards in headway times, walking limits to pickup points and advance-notification make it difficult for a simple expansion of public transit routes to address such need.

In 2006, Orange County established a Parole Re-Entry Task Force using New York State Division of Criminal Justice Services funding. The task force is comprised of more than 30 public and non-profit state and local agencies focused on assisting ex-offenders in making a successful transition from prison to community. Transportation quickly became a key focus for all the service providers around the table, not just for parolee needs, but as a critical link for all clients to successfully navigate a multitude of programs and services. In summer 2007, the Task Force formed a transportation subcommittee charged with exploring transportation needs of human service providers. The subcommittee gathered useful information for this planning process. The Task Force held several preparatory meetings in late 2007 and early 2008, where member agencies were asked to collect relevant data for the plan content and suggest participation from other stakeholder organizations. In addition, awareness of the CPTHST planning process was raised and input solicited from Orange County department heads and commissioners at multiple county department head meetings. Need and opportunity surveys were sent out through email to county departments and outside organizations. Information was also collected in face-to-face meetings, telephone conversations and by internet research.

The formal information-gathering process for this plan began in January 2008 with a query to human service agencies and an invitation to a luncheon forum held in March 2008. At the March forum, non-profit organizations, county departments, local and state agencies, current federal funding recipients and those interested in first-time funding met with OCTC County Planning staff. The meeting began with a presentation regarding the new requirement for a Coordinated

Public Transit – Human Service Transportation Plan followed by an opportunity for agency representatives to describe their existing services, current and projected demand for services, and their needs and recommendations. Although not a comprehensive analysis, this extensive participation has informed the preparation of this plan document and provides a basis for further dialogue, planning, and collaboration.

Based on feedback from this planning process, it is noted that the following suggestions were made regarding potential locations for new transit stops, expanded service, and other service related matters:

- Orange County Government Center
- All County Offices and Satellites
- Emergency Housing
- Mental Health Providers
- Substance Abuse Providers
- Top 20 employers (Valley View, Mt. St. Mary, SUNY Orange, Yellow Freight, etc.)
- Weekend, evening and dial-a-bus service to accommodate shift work
- Earlier service to accommodate 7AM shift start at retail and distribution centers
- Bus service to Family Court in Goshen twice per day (once to be dropped off at 9am with a return trip offered at 12pm and later at 12:30pm with a return trip at 5pm)
- Bus service to OCDSS & Valley View on Quarry Road; (same schedule as family court)
- Local service in Newburgh from far upper Broadway to lower Broadway where all of the major service providers are housed. (Given that there is already hourly, local fixed route bus service on the entire length of Broadway, this is an example of another issue which exists: knowledge about existing transit services is lacking.)
- Local service from central location to large grocery store (many low income persons end up spending their food stamps at small local stores which can be very expensive).

**Orange County Human Service Agencies / Transportation**. Several human service agencies in Orange County provide or contract for transportation services. They include a cross-section of County Departments and non-profit organizations.

Orange County Department of Social Services (OCDSS) currently provides medical transportation for approximately 45,000 Medicaid recipients and 12,000 managed care clients annually. Public transit services are used when possible. However, a great number of trips for clients without special transportation needs are purchased, primarily from taxi companies and ambulette services. OCDSS contracts with Occupations Inc. for transportation of Medicaid recipients to day-treatment programs and also sub-contracts a regular twice-a-day van service out of county to the Westchester Medical Center for dialysis and other medical services. Taking steps to streamline Medicaid transportation in the county and reduce costs, OCDSS entered into a performance-based contract with a transportation management company several years ago to assist in the efficient and cost-effective utilization of available transit services, depending on the needs, schedules and geographic locations of clients and treatment facilities. Medicaid transportation also involves a number of federal regulations related to the provision of service which can make it difficult to use fixed-route public transit, municipal dial-a-buses, and the County's ADA Paratransit services. The OCDSS transportation management company's

dispatcher tracks pickup points, length of time on bus and other factors so that approximately 15,000 Medicaid clients each month are directed to existing public transit and lowest-cost transportation alternatives. Still, the County's cost of Medicaid transportation reached \$6.5 million in 2007 and is still rising. In some cases, taxi services for Medicaid clients amounted to 50 trips per day within the same zip code. OCDSS has been working with its transportation management company, the County Planning Department and others to explore how to increase the use of public transit and other options. In the continued effort to cut costs, OCDSS is currently exploring a lower-cost, dedicated, contract service to serve Medicaid clients exclusively. [OCDSS and all other Orange County agencies can be accessed via the internet through the central Orange County website: <a href="https://www.orangecountygov.com">www.orangecountygov.com</a>.]

In addition to Medicaid transportation, the *Human Services Division of OCDSS* provides a wide array of case management services for thousands of Orange County children and families who are served through the Foster Care and Child Protective Services programs. In 2007, OCDSS received 3500 child protective services reports; it currently serves 450 children in foster care. Accessible transportation is an essential component of successful human service delivery and is linked to increased family reunification, shorter stays in foster care, more stable homes and healthier and safer environments for families. Since approximately 90% of clients have no automobile and limited means to secure transportation, division staff works to ensure that identified clients get to their destinations. These include, but are not limited to:

- Participation in court-ordered services (including mental health treatment, substance abuse treatment, and parenting education.)
- Court appearances
- Family visitation
- Medical appointments (for both parent and/or child)
- Child care
- Employment
- Participation in educational meetings concerning children

The main method of transportation provided to Human Service Division clients is via casework assistants and/or couriers. Currently, OCDSS maintains a staff of 16 casework assistants that spend approximately 60% of their time driving (rather than assisting caseworkers). Three couriers are full-time drivers and one transportation coordinator (not the OCDSS transportation management company) manually schedule division transportation needs. A total of 16 cars currently are assigned to this staffing group. Taxis also are ordered via County voucher, providing door-to-door service on a case-by-case basis for client-specific needs. In 2007, about three hundred voucher cabs were ordered from seven taxi cab vendors at a cost of over \$14,000. Additionally, the Human Services Division currently has 19 County cars assigned for use by casework staff for field work and other transportation needs. It is estimated that the Human Services Division spends over \$800,000 annually in just the salary and fringe benefit costs associated with transporting clients in county cars. These costs do not factor in the operation and maintenance of county vehicles.

The *Orange County Employment and Training Administration (ETA)* provides employment and training services to displaced workers in Orange County. ETA's Temporary Assistance to

Needy Families (TANF) Employment Unit operates out of the Orange Works One Stop Career Centers, with offices in Newburgh and Middletown. In addition to TANF Case Managers located at the One Stop Offices, ETA also provides a variety of programs supporting job-readiness, literacy, education and educational assessment, and childcare assistance, as well as a wheels-to-work donated vehicle program. ETA houses a Transportation Unit located at the Newburgh One Stop Center. The ETA Transportation Unit now consists of an Operations Supervisor, a Dispatcher, twenty-three part-time and two full-time drivers; it operates eight vans. The ETA Transportation Unit communicates directly with the TANF case managers, TANF clients and JARC clients to manage and route hundreds of clients every week. The success of the Orange County JARC program is credited by ETA as the single most critical factor for Orange County's state/federal work participation rate, which is 38%, the highest in New York State among counties of similar size. The agency operates vans six days a week to provide transportation service to clients and their children to enable parents to attend training or go to work. The ETA also contracts with several other agencies to provide transportation services.

The County's current JARC program began in 2007 with funding provided through two Congressional funding earmarks. This funding flows through a Federal Transit Administration Section 5309 grant which is administered by the County Planning Department's transit staff. The Orange County JARC program facilitates a critical transportation link for low-income residents from inner city neighborhoods in Middletown and Newburgh to employment opportunities in other areas of the county, typically with warehouse, distribution, health care and manufacturing companies. Through the Orange County JARC program, ETA provides approximately twenty van runs per day in four-hour shifts, primarily on 2<sup>nd</sup> and 3<sup>rd</sup> shift work schedules.

With ETA's transition in January 2008 to a full-time Operations Supervisor and a dedicated Dispatcher, the JARC program has become significantly more efficient and active enrollments have tripled. Currently there are over seventy JARC participants utilizing transportation on a daily basis. The Transportation Unit's new organization has increased the accuracy and efficiency of all routing. This has allowed for a reduction in reliance on taxi cab costs and increased administrative cost savings. Transportation dispatching includes client pickup from home, transportation to childcare (if necessary), and then concludes with transportation to work or to various training or work-fare assignments. All clients are subsequently transported back to original departure points. The ETA Transportation Unit, through its JARC function, has established several excellent working relationships with Orange County employers. ETA is hopeful that through additional transportation funding it can expand and improve relationships with these and more Orange County employers.

Transportation is obviously a key, critical component in ensuring the entry and retention of individuals in employment and program activity. Orange County was recently awarded a \$76,000 Community Solutions for Transportation grant from the Office of Temporary and Disability Assistance. This grant will offset the cost of one van and three part-time drivers. In addition, Orange County has agreed to fund a donated Wheels-For-Work program in January 2009. This program is a direct supplement in support through the ETA Transportation Unit. By providing vehicles for those individuals that have been riding ETA vans for significant periods of time, the program will promote transportation self sufficiency allowing continued employment without reliance on van service.

While the federal earmark JARC funding (a total of just under \$200,000 in two separate earmarks) has been vital for initiating the local program, ETA estimates that it is meeting less than half of the demand for transportation. JARC funding has focused on serving only the distribution cluster jobs – demand for similar service exists for low income workers employed in the hospitality and health care industry, but program funding is not sufficient to begin operating the program for these employment clusters. The earmark JARC funding supported the initiation of a two-year program. However, because the earmark funding can only support the program through 2008, it is critical to secure additional funding.

Over time it is hoped that an increased use of public transit will result in a relatively lesser amount of formulaic JARC funding through Section 5316 being needed to support a continuing JARC program. Given that there is an existing successful program with a demonstrated need, this plan recommends that funding from existing appropriations be used to continue support for this needed service while the county, state, and FTA work to meeting the literal requirements of the federal legislation to inject competition into this program. Overall, ETA currently spends approximately \$500,000 on transportation services for clients.

Although not direct providers of transportation, the *Orange County Office for the Aging (OFA)* and County's *Valley View Long Term Residential Health Care Facility* serve an elderly population that requires transportation to doctor's visits and shopping. Requests from seniors who need transportation for kidney dialysis, chemo-therapy and radiation therapy are common. The limited fixed-route transit services (together with the parallel paratransit services) in the county and the quasi-parochial dial-a-bus services can make them difficult to use for the needs of these two agencies and the elderly in general (when trips include travel to, from or through areas outside of transit service areas). OFA provides a number of programs and services for senior residents, including a Senior Dining Program. The agency contracts with a number of organizations (mostly senior centers) to provide limited additional transportation service for seniors. Through OFA, Orange County also provides limited funding to several municipalities and subcontracts with Jewish Family Services to provide assisted-transportation or escort services to seniors.

With 520 beds currently, Orange County's *Valley View Residential Health Care Facility* is the largest long-term care facility in the county. It is also one of the county's top 20 largest employers. The State's Berger Commission recently mandated 80 assisted living beds and 30 slots for Adult Day Care, but the Center's rural location a few miles south of the County seat in the Village of Goshen is outside current fixed-route public transit service areas, making access to these programs difficult. Lack of transportation affects families faced with making placement decisions, due to the cost of visitation and therefore the potential for decreased visitation. Transportation also plays a factor in the recruitment and retention of employees. For example, Valley View employs many entry-level workers in its food service operation. Valley View Residential Health Care provides 120 trips per month for OCDSS appointments.

The *Orange County Veterans Service Agency* spends approximately \$100,000 each year transporting veterans to US Veteran's Administration (VA) hospitals and to VA and other centers for medical appointments and coordination of benefits. Serving primarily elderly

veterans, the agency runs a van four days a week to Port Jervis, Monroe and Castle Point. The agency also transports to Albany and the Bronx. The Veterans Service Agency has seen an increase in ridership, and it projects that demand for transportation services will increase due to the needs of increasingly younger veterans returning from armed service in Iraq and Afghanistan. There are approximately 1500 veterans from these wars currently residing in Orange County. A new VA center opened in Middletown in June 2008.



Occupations, Inc. was founded in 1963 by the parents of seven developmentally-disabled children desiring employment opportunities for their children and a place where children could learn valuable, marketable skills. With currently more than 500 employees at several locations, Occupations (<a href="www.occupations.org">www.occupations.org</a>) is one of the county's largest human services providers. It is known as a progressive and competitive community-based rehabilitation agency. Occupations, Inc. provides over 14,000 children, adults

and families each year with round-the-clock care and confidential treatment. Occupations also partners with Community Solutions for Transportation, OCDSS, and ETA to provide transportation and related support services to low-income families. Occupations operates countywide with a fleet of 102 vehicles comprised of vans, buses and cars. It assists almost 600 people daily in traveling to Occupations' various service centers, as well as to community jobs and recreational opportunities. In 2006, transportation expenditures amounted to \$1.4 million of the agency's \$36 million budget. In recent years, Occupations been a recipient of FTA Section 5310 funding administered by New York State.

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The county's local chapter of the *Association for the Help of Retarded Citizens* (AHRC) has also received Section 5310 funding in recent years. Founded in 1954, this Orange County chapter of NYSARC, Inc. is a private not-for-profit organization that operates residential facilities and day treatment programs for approximately 1000 persons with disabilities of all ages (<a href="www.orangeahrc.org">www.orangeahrc.org</a>). AHRC offers evaluation, early intervention, and educational programs to children up to age 21 at schools in Middletown and New Windsor. Services provided include child care; adult residential and day habilitation programs; employment opportunities and supported employment services; bilingual service coordination; and family support services. AHRC



provides round-trip, door-to-door, fare-free transportation five days a week to nearly four hundred clients from their private or group residences to AHRC's residential facilities and day programs within Orange County. AHRC also provides transportation for daily activities and medical services during its day and residential programs. AHRC operates 44 vans and minibuses for daily program transportation (including spares) as well as another 77 vans, cars and trucks for agency operations. Agency-wide, AHRC manages a fleet of over 120 vehicles that travel 1.4 million miles annually. The agency trains, tests and certifies over 265 drivers each year. To assist with the associated costs, the New York State Office of Mental Retardation and Developmental Disabilities (OMRDD) currently provides \$1.7 million in support of AHRC's program-related transportation services.

While not a distinct agency providing transportation, the *Orange County Parole Re-Entry Task Force* is comprised of non-profit and public agencies, who understand transportation to be a

critical issue for service provision. Many of these agencies provide transportation services in order to ensure that their clients can participate in programs and services. This task force is led by OCDSS. Member agencies at state and local levels work to promote the successful transition from prison to community for ex-offenders released from state and federal prisons. The needs of the NYS Division of Parole mirror the needs of the Orange County Jail and Orange County Probation Department. Orange County presently has approximately 1,400 probationers and 700 parolees, for whom transportation is a critical determinant – often the *single* determinant – of success. Ex-offenders who do not satisfy work or rehabilitation reporting requirements will most likely be found in violation of their release terms and sent back to prison. Ex-offenders who cannot find transportation to work or school often end up in situations leading either to new offenses or the violation of parole or probation. In Orange County, approximately fifty-five parolees are released into the county from state and federal prisons each month. More than half are unemployed; over a third have unmet program needs affecting not only the individual, but decreasing the quality of life for the entire community. Through the Parole Re-Entry program, transportation is provided by taking advantage of transportation services of other agencies, through existing van service as well as on an informal basis by mentors and friends. In April 2008 there were 119 clients requiring transportation to job interviews, job sites, health care facilities, visitation, and training sites. OCDSS recently purchased a van to assist with these needs; scheduling is done manually and one driver cannot keep up with the demand from the Re-Entry program.



A new applicant in 2008 for Section 5310 funding, *Inspire* is a not-for-profit agency which was originally founded as the Orange County Cerebral Palsy Association in 1950 primarily to help children with cerebral palsy. Inspire (<a href="www.inspirecp.org">www.inspirecp.org</a>) today provides a wide array of outpatient, educational, and support services for people of all ages with a variety of disabilities and challenges, and for the general public. Inspire is an affiliate of Cerebral Palsy Associations of New York State and is a

member agency of Orange County United Way. Inspire serves adults and children with developmental disabilities; adults and children with traumatic brain injury; siblings of children with developmental disabilities; and persons in the general public who use its dental clinic and outpatient treatment center. Inspire currently provides approximately 21,000 units of service to 3,500 patients through its outpatient diagnostic and treatment center; serves 250 children with special education pre-school and evaluation services and provides 400 individuals and families with consumer and family support services. Inspire does not currently have a vehicle to provide transportation for its expanding programs. Inspire has applied in 2008 to NYSDOT for Section 5310 funding to fulfill OMRDD funding requirements as they expand to operate an adult day habilitation program and two residences. The Section 5310-funded vehicle would also be utilized to support Inspire's traumatic brain injury structured day program and to provide opportunities for adult recreation and community activities. Inspire anticipates serving a minimum of approximately 4,300 clients in all of their programs, plus the addition of the new programs mentioned, as well as other short-term future endeavors currently being developed.

Rayim of Hudson Valley is a Not-for Profit service provider for people with disabilities thru NYS OMRDD. Rayim currently serves about 60 individuals in the Orange county area with an array of services. Rayim runs a day program for about 25 individuals in Monroe NY and

operates an after school respite program for children in Monroe. Transportation is currently very limited and provided by Medicaid funds. Rayim of Hudson Valley is a new applicant to the Section 5310 program.

Many other non-profit agencies throughout Orange County, including faith-based and religious organizations, use personal and organization vehicles to transport clients for a variety of needs. Agencies include those with long histories of transportation service provision such as Catholic Charities, which provides transportation to and from hotels for homeless clients, and others such as Saint Theresa's Nursing Rehabilitation Center, as well as municipal and private senior services programs. A few of these agencies have applied to NYSDOT in 2008 for Section 5310 funded vehicles for their programs. These smaller but valued community service agencies reinforce the importance of formal and informal transportation networks as key elements in serving county residents.

# Relevant Transportation and Human Service Assessments & Plans

Orange County Community Health Assessment (2005-2010). Local health departments are required by New York State to prepare and submit a Community Health Assessment every 5 years. As stated in New York's health assessment guidance document, "Community health assessment is a fundamental tool of public health practice. Its aim is to describe the health of the community, by presenting information on health status, community health needs, resources, and epidemiologic and other studies of current local health problems." The Orange County 2005-2010 Community Health Assessment (CHA) represents the ongoing efforts of representatives from community-based health, social service, mental health, and education agencies; health care providers; the Advisory Board of Health; and Health Department representatives to identify health needs and to collectively determine strategies to improve the health of County residents.

The 2005-2010 OC CHA cites lack of transportation as a critical social factor that impacts health and/or limit access to health care:

"Health access concerns expressed universally by Orange County hospital and health center representatives include expanding transportation services. Persons without an automobile may have difficulty accessing medical services, and face lengthy travel times and multiple transfers to reach health care. Hospitals and medical centers are distributed throughout the county, however some are not located in low income areas or along public transportation routes. Many individuals and families need to travel out of county for specialty care and, with the exception of Medicaid transportation, public transportation is not easily accessible. Working parents are often unable to afford or obtain time off from work to attend appointments during the day, and child care needs impede out of county travel.

Many children and adults who need access to primary and preventive health care have family incomes that are too high for Medicaid eligibility, but also are so low that paying for medical costs becomes prohibitive (the working poor). The lack of transportation to available services is a key barrier to accessing primary care that is caused by inadequate income. In addition, the migrant farm worker population in the county, predominately Hispanic/Latino immigrants from Mexico and Central America, of whom 95% earn annual incomes of less than 200% of the federal poverty level and 90% are uninsured, face health barriers compounded by other factors including lack of transportation. The 2000 Census showed that only 60 percent of people between the ages of 16 and 64 with disabilities are employed. The unemployment rate for Americans with disabilities hovers at around 70 percent.

The lack of adequate transportation is a primary barrier to work for people with disabilities; one-third of people with disabilities report that transportation is a significant problem."

Orange County Integrated County Plan (ICP). In order for Orange County to receive funding from the New York State Office of Children and Family Services (OCFS), the Orange County Youth Bureau, Youth Advisory Board, and OCDSS are charged with developing a plan for children, youth and families. The plan must identify the needs of all children and youth by collecting and analyzing relevant data. Comparisons of local data are also made to state and national trends. This plan is completed and sent to OCFS every three years. It is the document that drives the resource allocation process. The ICP and the Orange County Community Profile/Needs Assessment are the products of a collaborative effort between the OCDSS, Youth Bureau and Partners for Children, Youth & Families. The ICP adheres to the following principles and objectives:

- support and acknowledge a local collaborative planning process inclusive of broad stakeholder involvement
- construct a planning process that has meaning and utility locally
- focus on outcomes for children, youth, families, adults and communities

Like the CHA, the ICP also cites the lack of transportation as a key issue for many county residents and it emphasizes the critical link between access to transportation and positive outcomes for clients. The ICP addresses the link between access to transportation and access to quality child care, which affects many other issues, including employment for single mothers. The CHA concludes among its findings that the current bus transportation system provides limited direct transportation from low-income areas to the primary and specialty health care services used by this population; improvements to the public transportation system could improve access to health care services throughout the county. The cumulative impact of inadequate transportation contributes to the cycle of dependency that many clients face because it affects many aspects of life, including physical health, mental health, court compliance, mandated treatment, education, employment, child care and home environments.

The **Orange County Transit Improvement Study** completed in 2001 suggested an eight step approach to the implementation of improved transit in the County. The County continues implement study recommendations so as to improve public transit service for all residents and, as noted above, thereby improve services for populations of key focus in this coordinated transit / human service planning effort. The eight recommendations:

- Establishment of Transit Hubs An effective way to meeting increasing travel needs is to establish points for transfers between transportation modes (or even direct access to services without transfer for hubs located at centers of activity).
- Increase Newburgh and Middletown transit services by increasing frequencies and providing special employment-oriented services. [Recent progress was made in this regard in the Middletown area with the extension of service into Wallkill and then out to the medical facilities on Crystal Run, which involve the coordinated efforts of four transit operators and the county.]
- Consolidate Local Paratransit Systems This study recommendation involved the grouping of towns so that existing dial-a-bus operations would either be expanded and/or consolidated to increase the opportunities for residents to travel between communities.

- This consolidation would also be conducive to feeding the fixed route services at the transit hubs. [This has happened to some extent through the collaborative efforts of the municipal operators noted above.]
- Modification of ADA Paratransit Service This was recommended to be accomplished
  either through contracts with single providers or a number of providers. It was also
  recommended that the County investigate allowing eligibility determinations be made via
  contracts with the local independent living centers or other such agencies.
- Develop a Coordinated Marketing Campaign to include the development of a new name, logo, and color scheme for use on vehicles providing transit service in the County. [The name, logo and color scheme were developed in 2006; all new buses purchased through Orange County will in some way make use of coordinated graphics. More individual and unique graphic treatments (for buses, signage, shelters and schedules) will be developed for each distinct service within the system.]
- Coordinate Human Service Agency Transportation While this was a suggestion in 2001 it is now mandated by SAFETEA and hence this present planning effort.
- Streamline County Administration of Public Transportation Services Take steps necessary to allow the County to better manage the existing and future transit operations in the County through increased staffing, software development, and better interaction between bus service providers. [Some progress has been made in this regard since 2001. At present the County Planning Department is working to engage the services of a team of transit professionals to carry out specific, already-programmed transit projects (such as expansion of intra-county bus services and improvement of the transit hub in downtown Middletown), to create better program and grant management systems, improve financial planning and programming, and carry out a number of other transit planning tasks. Through this effort and the concurrent transit planning component of the Newburgh Area Transportation & Land Use study it is expected the county and its partners will develop specific plans for expanding and improving bus services in both Middletown and Newburgh.]
- Develop a Process for Evaluating Service Requests and Suggestions.

The **OCTC Long Range Transportation Plan** is required to be updated every four years; it was updated most recently in November 2007. This plan provides a comprehensive overview of the entire transportation system and, given that the transportation council and its guiding regulations stem from federal legislation, there is a particular focus on the larger agencies and major transportation facilities which receive federal aid. The OCTC long range plan includes a number of goal and policy statements, some of which relate to human service & transit planning (and which, in future updates, will itself be reflective of continuing coordinated human service / transit planning). The long range transportation plan and many other studies, plans, and links to other transportation resources are available at: <a href="www.orangecountygov.com/planning/octc">www.orangecountygov.com/planning/octc</a>. Following are a number of 2007 OCTC long range plan statements of goals and objectives that speak to transit / human service transportation planning issues (the letter order of the goals is based on how they appear in the long range plan):

**GOAL A:** "Adequate, safe, balanced and efficient multimodal transportation for motorized and non-motorized users at reasonable cost to the people of Orange County and New York State" where objectives include cost-effective modes and provision for the travel needs of mobility-limited persons (elderly, disabled, economically disadvantaged) and meeting ADA requirements.

Some of the recommended actions to attain this goal include completing this Coordinated Public Transit – Human Services Transportation Plan and the review and update of the County's ADA paratransit policies, making service improvements as warranted.

GOAL C: "A healthy and vital economy adequately supported for continued smart growth by the transportation system" where objectives include the development of infrastructure necessary to service Stewart International Airport as it expands and provision of convenient access to employment centers for all people, including the economically disadvantaged. Some of the long range plan's recommended actions to attain this goal include the coordination of transportation planning activities related to Stewart International Airport with member agencies (NYSDOT, the Port Authority of New York & New Jersey, MTA Metro-North, local governments) and completion of the Newburgh and Mid-county Transportation and Land Use studies.

**GOAL G:** "Create and maintain a cost effective, integrated, and secure multimodal transportation system for motorized and non-motorized users and obtain adequate financial resources to support it" where objectives include cost-effective allocation of funds in order to rebuild and maintain the County's transportation infrastructure and development of private sector initiatives, public-private partnerships, and innovative financing mechanisms to fund transportation needs. Some of the long range plan's recommended actions to attain this goal include reviewing the overall funding of operation and maintenance of all transportation systems in Orange County and the identification of practical recommendations to improve the cost-effectiveness of transportation spending as well as seek to increase overall funding.

Factors Inhibiting Use of Public Transit by Human Service Agencies & Their Clients. In previous planning efforts and studies, as well as through this current coordinated transit / human service transportation planning effort, a number of factors have been identified as barriers that inhibit the use of public transit services by clients. In some cases, these barriers represent challenges not easily solved by improvement and expansion of fixed-route public transit services, requiring a different approach to effective service provision for clients in need of transportation.

Client Barriers include deficits in education, language and literacy. Many users of public transit and those who might use transit have literacy and reading difficulties. Growing immigrant populations present challenges of navigating a public transit system in English only. Physical disabilities and mental health needs complicate the ability to navigate public transit. Working parents with child care needs require multiple stops at child care facilities and then to places of employment, which complicates routing and scheduling. Seniors may have difficulty getting to a bus stop due to decreased mobility; long wait times are also problematic for them due to physical limitations and health conditions. In the case of parolees, individuals are not approved to obtain a driver's license and for non-pedestrian trips are totally dependent on human service agencies, friends, family, taxis, and public transportation. The sprawling, automobile dependent physical organization of our American communities also works against the use of public transit simply because, at present, the origins and destinations of many trips are so dispersed.

<u>Bus Frequency, Routing, & Discontinuity of Services</u> affects the ability to use public transit, especially in regard to attaining and retaining employment. Inadequate frequency of runs and limited service past 5PM during on weekdays as well as limited or no services on weekends do not accommodate present day retail and shift work scheduling. Two-hour headways (time

between buses) and even one-hour headways can simply be too great to make public transit feasible for many people. Aside from the fact that municipal dial-a-bus services require advance reservations, these services often do not cross municipal boundaries. Even when they do, it is generally only to an adjoining community and not necessarily to employment and shopping centers. Rotating work schedules and unpredictability of work scheduling can make it difficult to project which routes and frequencies will meet demand. Many jobs are located in distribution centers that are outside current transit service areas (hence the demand demonstrated by the Orange County JARC program).

Geography & Dispersion of Activities. Orange County's large geographic area (816 square miles) makes cost-effective, county-wide, fixed-route public transit impractical. Away from the cities and settled villages, the housing density of suburban and rural areas is relatively low. While public transit routes can or might serve a main thoroughfare in a town, the locations of most housing, employment and shopping are dispersed and too distant for convenient pedestrian connections which then requires a car or other transportation to get to the bus. Given the current physical organization of homes, stores, offices, and other destinations, convenient and cost-effective public transit may never be possible in certain areas or for certain trips. In addition, many service providers, especially health-care providers, have moved their facilities to the outskirts of city centers, where development and operating costs (for them) are lower. These new locations are often located outside existing bus routes and the burden is placed on the individual client to these services. In a similar vein, while more than a third of the county's poor are located in the cities, job and income growth has been primarily occurring in areas outside of the cities.

Communication. Due to limited communication between human service providers, transit planners, and operators and minimal local transit marketing and promotion to date, service providers, their clients and the general public are often not familiar with the existing public transit resources. In addition, there is low visibility of public transit services "on the street" in terms of routes, bus stops and signage. While it is possible to flag down buses, most people who do not already ride the system would not know to do this. This situation is complicated by the fact that buses (especially older ones) may not be marked with signage that makes destinations and routes clear to potential riders. For example, a bus might have a digital route sign which says "New York City", but in fact that bus can provide local service on the portion of its route within the county. Service providers, who might be able to educate their clients about how to negotiate the system, are also themselves unfamiliar and uncomfortable using the system. Language is also a barrier, as previously noted.

Coordination of Needs. Human service providers are currently often meeting client needs agency by agency in an uncoordinated fashion. Each agency has its own vehicles, drivers, maintenance process, and system for scheduling. This reality exists for a variety of reasons including funding sources and their regulations; other regulations; organizational structure, leadership and inertia; client-specific needs; methods of scheduling & dispatching; time constraints; and lack of collaboration with other providers. Even within county government, and for the same reasons, client-specific needs are often handled through the efforts and budgets of individual agencies, rather than through comprehensive needs analyses across all departments. What has not been attempted to date is a comprehensive, cross-agency data collection effort, followed by a thorough investigation and analysis into the locations of client origins and destinations, regulatory

parameters, special agency needs, vehicle needs and costs so as to identify strategies to improve services through shared efforts and reduce community costs.

## Other Factors Inhibiting Use of Transit:

- o In a car-dominated society and car-loving culture (aside from the dispersed locations of origins and destinations) there is a tendency to want to travel by car.
- In a fast-paced culture, many people do not have the time, cannot make the time, or simply do not want to make the effort to use public transit which will require waiting, walking, and making multiple transfers.

### **NYSDOT 2008 Section 5310 Application Cycle**

For 2008, Occupations Inc. has requested one Type II bus for use on their existing Monroe/Newburgh route. This constantly-changing route transports clients to Occupations' Union Street facility. As the Union Street facility program has grown and client needs have changed, Occupations has had to accommodate more clients and different mobility concerns. Current transportation is provided by a van; the requested new bus would afford Occupations the opportunity for extra seating capacity and allow for more flexibility in addressing these concerns and meeting client needs. The hours of operation would be from 5:45 AM to 5:00 PM. Occupations has also requested one Type IV bus, which is needed to replace an existing bus (Bus #89, a 1997 International). The replacement bus would be utilized on the "MID" run, covering the City of Middletown, and running from 5:30AM to 9:00AM and again from 1:30PM to 5:00PM

AHRC is adding 15 vehicles in 2008 to their current fleet to meet transportation needs. Eleven are replacement vehicles and four vehicles will meet new demand. AHRC will be applying to NYSDO T for Section 5310 funding to purchase two 24-passenger buses, each configured to accommodate 10 wheelchairs. There would be some flexibility in bus configuration as AHRC is requesting six flip-seats in each bus. The buses would replace two similar vehicles that are used Monday through Friday to provide transportation from client residences to AHRC's day program sites. One bus would travel from Campbell Hall to Newburgh, New Windsor, Cornwall and Highland Mills. The other bus would cover Middletown to Port Jervis. Routes would be determined by actual need and would provide "home to program" transportation. Routes cover pickups in most areas of Orange County to AHRC program centers in Middletown, Campbell Hall and Chester.

Inspire is currently in development of a six-bed OMRDD home to serve adults with traumatic brain injury who are eligible for OMRDD services, as well as a second six-bed OMRDD home that will serve consumers with diverse developmental disabilities. Upon opening of these homes, transportation for clients will be necessary daily for both day and evening hours. In addition, Inspire has received two approvals to operate adult programs, one for traumatic brain injury and one for predominately physically-challenged adults with high cognitive abilities. Within the second quarter of 2008, Inspire anticipates an immediate need to transport 24 people on a daily basis with the inception of these two day-programs. Within 18 months, Inspire projects to begin serving six clients, increasing to twelve for the two six-bed OMRDD homes. Inspire currently owns one van and a car that are utilized by its Home Services Department for the required

Medicaid face-to-face home visits, but neither vehicle is suitable for wheelchairs or daily, ongoing client transportation. Inspire proposes to use Section 5310 funding for a Type III vehicle with 4 wheelchair positions and 6 ambulatory seats. Multiple trips would be made if more than four wheelchairs are involved. As a cerebral palsy center, Inspire anticipates a great deal of usage for wheelchair transport, since it is not readily available to its clients.

Inspire anticipates a minimum of two AM/PM runs, one in the eastern portion of Orange County and one in the western portion, with some overlap into neighboring counties if needed. Hours of operation of the regularly scheduled eastern and western routes would be 8:00AM to 5:00PM, Monday thru Friday. The schedule will include round-trip transportation for day programs, as well as demand-responsive use for medical and therapeutic appointments. Evenings and weekends will include regularly-scheduled activities, and demand-responsive use for clients to participate in community activities. The vehicle would also be utilized as needed to support social and recreational group activities. Inspire anticipates more than four wheelchair participants in its day programs; requiring additional runs as needed in the eastern and western sectors of Orange and neighboring counties.

Rayim of Hudson Valley has applied for the Section 5310 funding for two Type III buses to enable them to provide transportation that is more adequate for their clientele on a daily basis to and from their day program, as well as to be able to get to and from work in a more sufficient way. The requested buses will also enable their clients to get better transportation to local and community events as well as to be able to better enjoy recreational activities on an ongoing basis. Rayim of Hudson Valley is also in the process of developing two group homes in Orange County that will serve as placement for 12 individuals. This development will automatically increase the need of transportation to recreational and medical activities on a daily basis.

**Recommendations.** This Coordinated Public Transit – Human Service Transportation Planning effort marks the beginning of an ongoing process to improve and enhance Orange County's public transit system and special needs transportation services for the benefit of all residents. The planning process revealed a general sentiment among human service providers that client transportation needs have not always been heard. Participants also expressed frustration that the speed with which improvements to Orange County's public transit system have been proposed and implemented does not always reflect the urgency of the need of clients who depend on accessible transportation to earn a living, comply with court mandates, or access medical care.

Human service clients depend on affordable access to reliable transportation services as a lifeline to basic needs such as employment and medical care. The significance of transportation in breaking the welfare cycle was also stressed by human service providers.

In order for human service providers to feel that their input to this planning process has been heard, it is imperative that these needs are incorporated explicitly in future transit and transportation planning; development of transit service improvements and expansions; programming for transit vehicles; and related efforts. Just as transportation documents to date do not always reflect a concentrated effort to solicit participation from human service providers, human service plans and assessments (e.g. the ICP and OCCHA mentioned above) have not always included input from transportation planners and transit decision makers, even though

documents cite transportation as a key need for the community and resulting quality of life for residents. Therefore, transit planners and operators expect that human service agencies will similarly incorporate communication, coordination, and understanding of transit service and funding realities when developing and updating their program and agency plans.

All participants in this planning process expect to see ongoing progress made toward creative, practical, sensitive, and cost-effective improvements in public transit systems. This progress will assist in the improvement of community well-being in part through better human service delivery and in part through a reduced need for those services as clients become independent from assistance through initiatives that include accessible and affordable transportation. Participants also expect to see progress made in focused human service transportation systems when needs cannot be feasibly or cost-effectively served through public transit, or where programmatic requirements of funding agencies or client needs argue for transportation services that are especially tailored to those requirements. Participants are very hopeful that there will be future successes from some combination of creative, shared and organizationally-flexible service delivery systems which would maximize service, convenience and happiness while minimizing overall costs to the community.

Many of the recommendations proposed in this plan are among actions and strategies identified in existing transportation and human service agency plans. Aside from any targeted public transit improvements for those in need of services form human service providers, as the public transit system in Orange County continues to improve for the general public, low-income populations with arguably the most critical need for public transportation will necessarily benefit.

In this spirit, below are organized a number of recommended strategies, actions, policies and future planning activities. Some are immediate, others short term or longer-term, whilst a few have no real time-component.

#### **IMMEDIATE**

- All of the applications from human service agency applicants within the county in 2008 to the NYSDOT-administered FTA Section 5310 funding program appear to be for needed equipment to provide human services to Orange County residents. OCTC supports all of these applications and requests that NYSDOT seek to fund these needs to the greatest extent of available funding, while balancing the practical needs of other counties and communities across the Empire State.
- Work with the Poughkeepsie-Dutchess and Ulster Transportation Councils to develop a methodology for allocating and programming Section 5316 and 5317 funding provided to the three-county Mid-Hudson Valley (large urban) Transportation Management Area. Orange County Planning will coordinate the local programming of these large urban funds with any available Section 5316 and 5317 funds which may be provided to the Middletown small urban area.

#### OTHER RECOMMENDATIONS

• Follow through with UPWP-supported transit planning. Continue the development of local strategies, policies, and processes for the utilization of any available funding from the Section 5310, 5316 and 5317 programs.

- Formalize an ongoing integrated planning process between transportation and human service sectors in Orange County:
- OCDSS and ETA should designate staff to sit in on MPO planning processes, committees and meetings to ensure ongoing representation of human service needs.
- Establish an ongoing action-oriented subcommittee or advisory group inclusive of health and human service providers to ensure ongoing identification, development and implementation of CPTHSTP goals, including advising on updates to the ADA Paratransit program.
- Promote or even require cross-agency participation and inter-disciplinary involvement in planning processes and related reports. For example, human service provider participation in formal documents prepared by OCTC and the OC Planning Department or participation of transportation planners and transit stakeholders in county Community Health Assessment updates to NYS Department of Health and in updates of the Integrated County Plan required by NYS Office of Children and Family Services.
- Expand and/or implement new routes within the Newburgh area (and other areas where warranted), with a view toward serving the needs of human service provider clients (e.g., incorporate high-usage pick-up and destination points for Medicaid clients).
- Improve awareness among transit planners and operators regarding the top destinations within Orange County for human service clients. Utilize mapping, vehicle routing and other software to facilitate this awareness and for transit service planning.
- Through the planning process, ensure advocacy for human service clients and destinations as routes are designed.
- Incorporate into the planning process information regarding Medicaid and other human service program regulations, scheduling, and work-shift demands
- Through the planning process, ensure advocacy for human service clients and destinations as routes are designed.
- Conduct a series of workshops across the County to educate human service providers and the general public about the new transit guide and existing public transit service.
- Develop signage and bus stops
- Include human service needs in developing and implementing the required Limited English Proficiency (LEP) plan
- Improve the profile of public transit to increase awareness of services through increased promotion, education and marketing
- Adapt a future printing of the Transit Guide for a 3rd grade reading level, with even more visual aids to accommodate residents with intellectual and literacy challenges. Develop a large print edition for the visually impaired.
- Explore development of (and implement if possible) an interactive website where service providers and/or clients can enter (or point to) their pick up and destination points, in order to understand best transportation options. This has the added benefit of data collection as requests would also be used to understand who wants to go where, and when, in order to potentially add routes and frequencies that are in high demand. If properly marketed and used, this website could become a key mechanism for recurring feedback to determine needed, new or expanded services.
- Buses with more helpful route descriptions / destinations on them
- Work to extend or improve services to Saint Luke's Cornwall hospital and Crystal Run Healthcare.

- OCDSS & OC Planning need to continue exploring strategies for reducing Medicaid transportation costs and streamlining service delivery, which likely include adding routes and increasing frequencies that will serve Medicaid Clients and provide the potential of leveraging Medicaid funding for the public transit system.
- Open and equal access for all eligible and qualified applicants to the FTA Section 5310, 5316 and 5317 funding streams. In this ongoing CPTHSTP process, applications and requests for funding in subsequent years will be evaluated according to the priorities of this plan and identified needs within our communities, with the goal to include in the plan those applicants who have a proposal and the organizational capacity that will maximize funding opportunities and best serve the community needs. These procedures and policies will be developed and revised as necessary to be consistent with current FTA program circulars. OCTC is in the process of developing the procedures for new and recurring applications, and will consider utilizing, as other counties as already done, a scoring matrix to evaluate applications according to expressed priorities, need and demand. Orange County will consider promoting and providing open educational workshops to outline these specific funding opportunities, in order to ensure that the process is objective and inclusive of all eligible applicants.

## Agencies Involved in the Coordinated Public Transit – Human Service Transportation Planning Process

## **Orange County Departments**

**Planning** 

Office for the Aging

Social Services – Medicaid Transportation Division

Social Services – Human Services Division

Probation

Orange County Jail

Office of Community Development

Veterans Service Agency

Valley View Residential Health Care Facility

Mental Health

**Employment and Training Administration** 

Health – Community Health Division

Health – Early Intervention Services

Youth Bureau

### **Non-Profit Agencies**

AHRC, Inc.

Occupations, Inc.

St. Theresa's Nursing Rehabilitation Center

Inspire, Inc.

Family Empowerment Council

Orange County Re-Entry Task Force

You Turn Services

Restorative Management

RECAP, Orange County's anti-poverty organization

Rayim of Hudson Valley

Newburgh Community Action Committee

Bridges of Orange County – Transitional Housing

Catholic Charities Community Services

Orange County Alcohol and Drug Abuse Council

Safe Homes of Orange County

Joint Mental Health Committee Association

Youth Advocate Programs, Inc.

#### **State Agencies**

Department of Transportation

Office of Parole

Department of Criminal Justice